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January 24, 2011

Via ECF

Honorable Kathleen A. Tomlinson
United States District Judge
United States District Court
Eastern District of New York
Long Island Courthouse
100 Federal Plaza
Central Islip, NY 11722-4448

**Re: Estate of THERESA MANIACI-CANNI and the Estate of GEORGE
CANNI, as owners and/or owners *pro hac vice* of the recreational vessel
UNCANNI, 2001 Hustler, for Exoneration from or Limitation of Liability
Index No.: 10-cv-00958 (LDW) (AKT)
Our Client: Peter Sofia**

Dear Judge Tomlinson:

This firm represents Peter Sofia, a claimant and respondent in the above limitation of liability proceeding.

As the Court is aware, Judge Wexler, by order dated January 14th, 2011, extended discovery for an additional 60 days in the above matter.

I am writing to request the Court's intervention in completing fact depositions. We have made a number of attempts to obtain commitments from other parties regarding their availability for depositions to no avail.

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I do not wish to be in the position of asking the Court for more time to complete discovery. Accordingly, I respectfully request that the Court schedule a telephone conference so that we can enter into a schedule for the completion of fact depositions.

Thank you.

Respectfully submitted,

SULLIVAN PAPAIN BLOCK
McGRATH & CANNAVO P.C.

By: 
FRANK V. FLORIANI

FVF:ds
(075317)